REMARKS

Initially, applicants thank the Examiner for taking the time to conduct telephonic interviews with applicants' representative on October 25 and 26, 2007. While the Examiner refused to conduct a detailed discussion related to the claim language, the Examiner did broadly discuss the features of the invention. The Examiner indicated that, based on his review of the file and discussions with his supervisor, he believed that the claims were not allowable over WAP related art. Applicants' representatives noted that the art referred to by the Examiner was not cited in the outstanding rejections. The Examiner indicated that applicants should file an appropriate response and that he would reconsider the claims in light of the response.

Applicants have amended claim 1 to more clearly recite the features of the claimed invention. The amendments are not intended to limit the scope of the claims.

Applicants have added claims 40 and 41 to round out the scope of the claims. Support for these claims may be found in Figs. 1-8 and in the associated portions of applicants' specification. No new matter has been added.

The Examiner appears to have rejected some of the claims under 35 USC 112. Applicants respectfully submit that the Examiner's statement that "Applicant's amendment to amend the 'Image forming device' with 'Printing device' regarded as intended use claim language," is not sufficient to allow applicants a fair opportunity to address the rejection. Applicants are not certain as to which claims the Examiner is attempting to reject, nor are applicants able to decipher the meaning of the rejection. Applicants respectfully submit that while the term "printing device" may tend to show a possible use of the device, this is common practice. Applicants are not required to label devices in a manner as to obfuscate possible features of the device. Accordingly, applicants respectfully request that the Examiner either withdraw the rejection or provide a new action sufficiently detailing the rejection such that applicants are afforded a fair opportunity to respond.

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Claims 1-32, 34, 36 and 38 stand rejected under 35 USC 103(a) on Friday (U.S. Patent No. 6,631,453) in view of Kenworthy (U.S. Patent No. 6,317,837). Applicants respectfully traverse this rejection.

Applicants initially note that not only has the Examiner failed to provide a sufficient motivation to combine the references, but the Examiner has also failed to address the teaching away from such a combination as previously noted by applicants. The Examiner has merely provided a generic statement acknowledging a duty to provide a motivation to combine. Accordingly, applicants again submit that the combination of Friday and Kenworthy is improper in light of the claimed subject matter.

Friday teaches away from the use of firewall technology as recited in claim 1. While Friday acknowledges the existence of firewall technology, stating at col. 2, lines 4-14, Friday teaches that firewalls are inadequate in modern computing to protect systems from external attacks.

Accordingly, Friday teaches a system in which firewalls are not used, instead disclosing the use of non-firewall based hardware and firmware to protect the system. Friday, which knew of and considered the use of firewalls to protect computer systems, consciously chose not to use a firewall based system, and instead discloses a system which replaces firewalls, thereby teaching away from the use of firewalls with the invention disclosed therein. Friday teaches a system that is to be used instead of firewalls, not a system to be used with firewalls, so there is no motivation in Friday to combine its teachings with a system which uses firewalls. In fact, Friday teaches away from making such a combination by stating at col. 2, lines 6-7, that firewalls actually provide "a point in the network that can be hacked by network tools." One of ordinary skill in the art reading Friday would have understood that Friday teaches that not only are firewalls inadequate to protect computer systems, but that they add a point through which the systems may be compromised. Consequently, one of ordinary skill in the art would have understood that the technology disclosed Friday was not intended to be used in addition to a firewall based system, but that it was instead

intended to be used <u>in place of</u> such a system. Accordingly, one of ordinary skill in the art would find no motivation to combine Friday with a firewall based system.

Kenworthy, in contrast to Friday, discloses an internal network node having a dedicated firewall. There is nothing in Kenworthy that would have motivated one of ordinary skill in the art to combine the firewall based system disclosed therein with the non-firewall based system of Friday. The cited references teach away from each other in that one states that firewalls should not be, and are not, used and the other teaches the use of a firewall. Consequently, the combination is improper and claims 1-32, 34, 36 and 38 are allowable.

Furthermore, even if the combination of Friday and Kenworthy were proper (which it is not), claims 1-32, 34, 36 and 38 would still be allowable because the combination thereof fails to disclose or suggest all of the features recited in the claims.

The combination of Friday and Kenworthy does not disclose or suggest the use of a portable terminal, an image data transmission device or an image printing device as recited in claim 1. Friday teaches the use of a data storage device 16 (which the Examiner has likened to applicants' file server) which is connected to two computers 12, 14 (see Figure 1). If, as the Examiner has asserted, computer 12 discloses applicants' image forming data transmission device and computer 14 discloses applicants' portable terminal, there is no device disclosed in the combination of Friday and Kenworthy that may be likened to the image forming device recited in claim 1.

Furthermore, the combination of Friday and Kenworthy does not disclose "said portable terminal establishing a connection with said image data transmission device via said second internal network, said second firewall, said external network, said first firewall and said first internal network, wherein establishing the connection comprises using a protocol which allows a first bi-directional connection between the first internal network and the external network and a second bi-directional connection between the second internal network and the external network," as recited in claim 1.

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Contrary to the Examiner's assertion, Friday does not disclose the first computer 12 and the second computer ever making a connection. The Examiner asserts that Friday discloses this feature at col. 2, lines 54-56, "The method includes establishing an active data connection to the first computer. A passive connection is established for the second computer." However, the cited passage merely discloses that each computer 12,14 makes an individual connection with the data storage 16, nothing in the cited passage (or the rest of Friday) discloses or suggests forming a connection between the two computers. Friday does not disclose that the computers 12,14 ever establish a connection with each other. Accordingly, Friday does not disclose forming a connection between a portable terminal and an image data transmission device as recited in claim 1. Kenworthy was not cited as making such a disclosure.

Additionally, the Examiner has conceded that Friday does not disclose "bi-directional connections between the internal networks and the external network," but asserts that Kenworthy discloses this feature. Applicants note that Kenworthy does disclose a NADFW-MS 111 which the Examiner asserts discloses bi-directional connections; however, the NADFW-MS 111 only controls connections between the internal NAD devices 116 and not between networks such as LAN 112 and the external network 122. To the contrary, the firewall between the LAN 112 and the external network 122 is a conventional bastion firewall 120 (col. 3, lines 57-61) which allows only unidirectional communication (col. 1, lines 33-43). Accordingly, neither Friday nor Kenworthy discloses the above quoted feature.

Furthermore, claim 1 recites, "said portable terminal transmitting an image printing request to said image data transmission device, wherein said image printing request identifies said stored file." Neither Friday nor Kenworthy discloses this feature. Friday discloses a system in which a data storage 16 is used to store files from a computer 12. A computer 14 may then access the data storage 16 to retrieve files stored therein. Friday, as explained above, does not disclose or suggest that the first computer 12 ever makes a connection with the second computer 14. Nothing in the

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cited passage, or any other passage of Friday or Kenworthy, discloses the transmission of a request from one computer to the other. Kenworthy was not cited as disclosing this feature. Because Friday and Kenworthy fail to disclose making any connection between the first and second computers, and do not address printing images related to stored files, the combination of references must fail to disclose the above quoted features.

Additionally, neither Friday nor Kenworthy discloses the transmission of an image forming request to any device. In Friday, data is stored in the data storage 16 by the first computer 12, there is no disclosure that this storage of data is in anyway requested. The Examiner has not identified any disclosure of an image forming request in either Friday or Kenworthy.

The references also fail to disclose or suggest, "said image data transmission device receiving said image printing request and preparing a print job to print images associated with said stored file in response to said image printing request" as recited in claim 1, at least due to their failure to disclose transmitting an image printing request or forming a print job.

Claim 1 is allowable due at least to the many features it recites that are not disclosed by the references, and further because of the lack of motivation to combine the references. Claims 7, 13, 15, 17, 21, 25, 28, 32, 34, 36 and 38 recite similar features to those discussed above and are therefore also allowable. Claims 2-6, 8-12, 14, 16-20, 22-24, 26, 27 and 29-31 depend from allowable claims and are therefore allowable due at least to their respective dependencies.

Applicants solicit an early response allowing the claims.

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     In the event the U.S. Patent and Trademark Office determines that an extension and/or other relief is required, applicants petition for any required relief including extensions of time and authorizes the Commissioner to charge the cost of such petitions and/or other fees due in connection with the filing of this document to **Deposit Account No. 03-1952** referencing docket no. **325772028100**.

Dated: October 30, 2007   Respectfully submitted,

                          By _____

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